

x

Sushovan Hussain
Reg. No. 24067-111
FCI Allenwood Low
P.O. Box 1000
White Deer, Pa. 17887-1000

Hon. Malachy E. Mannion
UNITED STATES DISTRICT COURT
For the Middle District of Pennsylvania
William J. Nealon Federal Bldg. & U.S. Courthouse
235 North Washington Avenue
P.O. Box 1148
Scranton, Pa. 18501

October 10, 2021

BY CERTIFIED FIRST CLASS MAIL

Regarding: Sushovan Hussain v. Thompson, et al.
Civil Action No. 3:21-cv-01635-MEM-DB

Dear Judge Mannion:

Petitioner Sushovan Hussain ("Hussain") respectfully submits this letter to reserve his rights to seek and file motion to compel written deposition pursuant to Federal Rule of Civil Procedure 31 upon receipt of respondents' show cause answer.

In September 2021 Petitioner filed a habeas corpus relief from discriminations and abuse of statutory authorities which violates his Constitutional rights. In October 2021 Petitioner filed for Temporary Restraining Order. Concurrently with this correspondence Petitioner includes a declaration in support of his Habeas Petition.

Pursuant to Federal Rules of Civil Procedure 26(b)(1), a party "may obtain discovery regarding any non-privileged matter that is relevant to any party's claim or defense." Relevant information sought in discovery need not be admissible at trial, as long as it "appears reasonably calculated to lead to the discovery of admissible evidence." *Id.* Relevance is generally "considered broadly to encompass any matter that could bear on, or that reasonably could lead to other matter that could bear on, any issue that is or may be in the case." *Oppenheimer Fund v. Sanders*, 437 U.S. 340, 351, 98 S. CT. 2380, 57 L. Ed. 2d 253 (1978).

This Court should indulge in a strong encouragement for additional fact-finding. Here, depending on Respondents' response, Petitioner will seek written depositions to support his pleadings including, inter alia, how BOP decisions impact foreign nationals, on the basis of the ICE Immigration detainer, in violation of its own policy statement and how the BOP formulated its criteria for eligibility for home confinement, which unilaterally excludes all foreign nationals, in contrast to directives in the Attorney General's April 3, 2020 memo.


Petitioner respectfully submits the above in reliance of his Constitutional rights and all applicable law and federal rule.

Dated: October 10, 2021
White Deer, Pa. 17887-1000

Respectfully submitted

/s/ Sushovan Hussain
SUSHOVAN HUSSAIN

Petitioner Pro Se

FILED
SCRANTON
OCT 18 2021
Per 
DEPUTY CLERK

INMATE NUMBER / NAME: SUSHOVAN HUSSAIN 24067-111
FEDERAL CORRECTIONAL COMPLEX: ALLENTOWN LEAD
P.O. BOX 1000
WHITE DEER, PA 17887

RECEIVED
SCRANTON

OCT 18 2021

PER CF
DEPUTY CLERK

LEGAL MAIL

CERTIFIED MAIL



7000 0600 0023 2001 4173

CERTIFIED MAIL[®]
FOR USE ONLY WITH ADD SHIPPING LABEL

LEAD 3806 N. JANUARY 2014

PER 7981-17-001-106

HON. MALACHY E. MANNION

UNITED STATES DISTRICT COURT

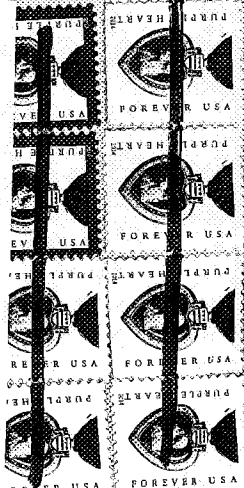
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

WILLIAM J. NEALON FEDERAL BLDG. & US COURTHOUSE

235 NORTH WASHINGTON AVENUE

P.O. BOX 1148

SCRANTON, Pa. 18501 - 1148



1000

18501



U.S. POSTAGE PAID
WHITE DEER, PA
OCT 14, 21
AMOUNT
\$0.00
R23051K138972-08